

Re: Draft of memo

DANIEL KIRK (States Attorney)

Wed 5/4/2016 5:47 PM

To: WALTER HEHNER (States Attorney) <walter.hehner@cookcountyl.gov>;

Cc: JOSEPH MAGATS (States Attorney) <joseph.magats@cookcountyl.gov>; FABIO VALENTINI (States Attorney) <fabio.valentini@cookcountyl.gov>;

Yes. Looks good.

Sent from my iPhone

On May 4, 2016, at 5:41 PM, WALTER HEHNER (States Attorney) <walter.hehner@cookcountyl.gov> wrote:

All:

This looks sufficient to me. Nice job.

Walt

From: JOSEPH MAGATS (States Attorney)

Sent: Wednesday, May 4, 2016 4:40 PM

To: DANIEL KIRK (States Attorney); WALTER HEHNER (States Attorney); FABIO VALENTINI (States Attorney)

Subject: Draft of memo

Attached is a draft of a memo to the ASAs regarding situations where it is unclear whether a judge's findings rise to the level of Giglio type of material and need to be disclosed. Please let me know whether there are any changes that you wish to have made. Once everyone has approved it, I will send it out.

Joe Magats, ASA

Deputy Chief, Criminal Prosecutions Bureau

2650 S. California Ave, 11D40

Chicago, IL 60608

Phone: 773-674-2721/2722

Email: joseph.magats@cookcountyl.gov

Fax: 773-674-2382



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Giglio material regarding Chicago Police Officer Wahbe Askar, Star# 8156

Date: May 4, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

On August 5, 2015 The Honorable Judge Joseph Claps, in the case of The People of The State of Illinois v. Steven Brown, 14CR-17730, made findings regarding the credibility of Chicago Police Officer Wahbe Askar, Star# 8156 that may impact his credibility should he testify in court in the future. A copy of Judge Claps' findings is attached to this memo

Pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). Judge Claps' findings regarding Officer Askar's testimony could potentially be found to be the type of information required to be disclosed under Giglio.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Askar is listed as a potential witness on our answer to discovery, Judge Claps' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Askar is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Askar's name in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Askar is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Askar is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Askar regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is Giglio material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Askar is going to be called as a witness.

In general, the case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1977). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2nd Cir. 1990); United States v. Veras, 51 F.3d 1365 (7th Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4th Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Wing Commanders

Robert Heilingoetter, ASA
Supervisor, Second Municipal District

John Dillon, ASA
Supervisor, Preliminary Hearing/Grand Jury Unit

Maria Burnett, ASA
Supervisor, First Municipal District

Peter Goutos, ASA
Supervisor, Traffic Division

Alzetta Bozeman-Martin, ASA
Supervisor, Domestic Violence Division

From: Joe Magats, ASA
Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Richard Fiorito, Star# 11624, 23rd District

Date: November 4, 2009

Cc: Shauna Boliker, ASA
Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA
Chief, Special Prosecutions Bureau

Mercedes Luque-Rosales, ASA
Chief, Narcotics Prosecutions Bureau

Tisa Morris, ASA
Chief, Juvenile Justice Bureau

Please have your ASAs check their files and see whether they have any cases on their call where Chicago Police Officer Richard Fiorito, Star# 11624, 23rd District is a witness. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Fiorito's testimony you should proceed on the case.

If you have a case where we cannot proceed without Officer Fiorito's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please let me or Shauna know prior to taking any action. Also have your ASAs keep track of how many Fiorito cases they have and how many of those cases were dismissed.

Additionally, please do not subpoena or notify Officer Fiorito to come to court. If he does appear pursuant to a previously issued subpoena or notification that we issued, please release him.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: Fabio Valentini, ASA
Supervisor, Felony Review Unit

All Wing Commanders

Robert Heilingoetter, ASA
Supervisor, Second Municipal District

Peter J. Troy, ASA
Supervisor, Fifth Municipal District

John Dillon, ASA
Supervisor, Preliminary Hearings/Grand Jury Unit

Alzetta Bozeman-Martin, ASA
Supervisor, Domestic Violence Division

Peter Goutos, ASA
Supervisor, Traffic Division

Maria Burnett, ASA
Supervisor, First Municipal Division

From: Joe Magats, ASA
Deputy Chief, Criminal Prosecutions Bureau

Re: Sgt. John Pallohusky, Star #2612, Area Four Violent Crimes

Date: November 20, 2009

Cc: Anita Alvarez
State's Attorney of Cook County

Adrienne Mebane

First Assistant

Walt Hehner
Chief Deputy

Daniel Kirk
Chief of Staff

Shauna Boliker, ASA
Chief, Criminal Prosecutions Bureau

Mercedes Luque-Rosales, ASA
Chief, Narcotics Prosecution Bureau

Tisa Morris, ASA
Chief, Juvenile Justice Bureau

Our office has charged Sgt. John Pallohusky, Star #2612, Area Four Violent Crimes, with Theft of over \$100,000. Please have you and the assistants that you supervise check your files to determine whether they or your unit have any cases where Sgt. Pallohusky is a witness. If you do, please send me a list of the cases, including the defendant's name, case number, charges, next date, and whether Sgt. Pallohusky is necessary witness. If you or your unit do not have any such cases please let me know that as well. Thank you.



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

**ANITA ALVAREZ
STATE'S ATTORNEY**

**CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608**

To: All Wing Commanders

Robert Heilingoetter, ASA, Supervisor, Second Municipal District

Peter J. Troy, ASA, Supervisor, Fifth Municipal District

John Dillon, ASA, Supervisor, Preliminary Hearing/Grand Jury Unit

Maria Burnett, ASA, Supervisor, First Municipal District

Peter Goutos, ASA, Supervisor, Traffic Division

Alzetta Bozeman-Martin, ASA, Supervisor, Domestic Violence Division

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Victor Brown, Star# 6098

Date: May 11, 2010

Cc: Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

As you may already know, Chicago Police Officer Victor Brown, Star# 6098 was charged

federally with making false statements to the FBI. Please have your ASAs check their files and see whether they have any cases on their call where Officer Brown is a witness. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Brown's testimony you should proceed on the case.

If you have a case where we cannot proceed without Officer Brown's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Shauna or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Brown's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Sean W. Sepcot, Star# 4094, 2nd District

Date: September 21, 2010

Cc: Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Sean W. Sepcot, Star# 4094 has been charged with Battery under Case No. 10 MC4-2061. Our office is the prosecuting authority in Officer Sepcot's case. The case is currently pending in Maywood and is next up on October 12, 2010. Pursuant to Brady v. Maryland, 373 U.S. 83 (1963) the prosecution's duty to disclose exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). As you are all well aware, the fact that any witness that we are calling to testify has a pending case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer

Sepcot as a witness, the fact that Officer Sepcot has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Sepcot is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Sepcot is a witness.

If you or the assistants that you supervise have a case where Officer Sepcot is a witness and you determine that he needs to be called as a witness in the case, please file and tender to the defense the attached Notice of Disclosure prior to trial. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

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IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS)

Case No. _____

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NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Sean W. Sepcot, Star #4094, 2nd District has been charged with Battery under Case No. 10 MC4-2061. That case is next up on October 12, 2010 in the Fourth Municipal District Courthouse in Maywood, Illinois.
2. That Officer Sepcot will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Sepcot regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Sepcot regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Christopher E. Bove, Star# 8230

Date: September 16, 2010

Cc: Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Chicago Police Officer Christopher E. Bove, Star# 8230 has been stripped of his police powers. Please have your ASAs check their files and see whether they have any cases on their call where Officer Bove is a witness. If he is a witness on a case please contact me immediately. Additionally if you or any of your assistants recall a case where Officer Bove was a witness in the past, please contact me as well.

If you or your assistants have any questions, please feel free to call me at (773) 869-2721.
Thank you.



OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Sean W. Sepcot, Star# 4094, 2nd District

Date: September 21, 2010

Cc: Adrienne Mebane, First Assistant
Walt Hehner, Chief Deputy
Dan Kirk, Chief of Staff
Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau
Jack Blakey, ASA, Chief, Special Prosecutions Bureau
Patrick Driscoll, ASA, Chief, Civil Actions Bureau
Tisa Morris, ASA, Chief, Juvenile Justice Bureau
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Sean W. Sepcot, Star# 4094 has been charged with Battery under Case No. 10 MC4-2061. Our office is the prosecuting authority in Officer Sepcot's case. The case is currently pending in Maywood and is next up on October 12, 2010. Pursuant to Brady v. Maryland, 373 U.S. 83 (1963) the prosecution's duty to disclose exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). As you are all well aware, the fact that any witness that we are calling to testify has a pending case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer

Sepcot as a witness, the fact that Officer Sepcot has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Sepcot is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Sepcot is a witness.

If you or the assistants that you supervise have a case where Officer Sepcot is a witness and you determine that he needs to be called as a witness in the case, please file and tender to the defense the attached Notice of Disclosure prior to trial. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS)

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NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Sean W. Sepcot, Star #4094, 2nd District has been charged with Battery under Case No. 10 MC4-2061. That case is next up on October 12, 2010 in the Fourth Municipal District Courthouse in Maywood, Illinois.
2. That Officer Sepcot will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Sepcot regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Sepcot regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau
Jack Blakey, ASA, Chief, Special Prosecutions Bureau
Patrick Driscoll, ASA, Chief, Civil Actions Bureau
Tisa Morris, ASA, Chief, Juvenile Justice Bureau
Brian Sexton, ASA, Chief, Narcotics Prosecution Bureau
All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Giglio Material Regarding Chicago Police Officers Slawomir Plewa, Robert Jackson and Gerald Lodwich

Date: September 24, 2010

Cc: Adrienne Mebane, First Assistant
Walt Hehner, Chief Deputy
Dan Kirk, Chief of Staff

On August 19, 2010 Judge Michael Brown, in the case of The People of the State of Illinois v. Slawomir Plewa, Case No. 08CR-19286, made specific findings that Chicago Police Officers Slawomir Plewa, Star No. 14604 and Gerald Lodwich, Star No. 6958 lied and gave false testimony in the Plewa case as well as lied and gave false testimony in the case of The People of the State of Illinois v. Sylwia Marcinczyk, Case No. 07CR-8869.

In his findings in the Plewa case, Judge Brown also stated that Chicago Police Officer Robert Jackson, Star No. 15556 lied and gave false testimony in the Marcinczyk case. In the Plewa case, Judge Brown acquitted Officer Plewa of the offenses of Perjury, Official Misconduct and

Obstruction of Justice for conduct arising out of the Marcinczyk case. In doing so Judge Brown made the specific findings regarding Officers Plewa, Lodwich and Jackson.

Pursuant to Brady v. Maryland, 373 US 83 (1963) the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972).

In light of the existing case law, Judge Brown's findings regarding the officers are Giglio material as "impeachment of a witness can make the difference between acquittal and conviction...where credibility is the central issue in the case and the evidence presented at trial consists of opposing stories presented by the defendant and government agents." United States v. Kiszewski, 877 F.2d 210, 216 (2nd Cir. 1985).

I have attached a Notice of Disclosure, as well the transcript of Judge Brown's findings that is to be filed with the court and tendered to the defense in all cases where any of the three officers are going to be called as witnesses. A copy of the transcript where Judge Brown made his findings is attached to the Notice of Disclosure. I will also send an email to each of you with the Notice of Disclosure attached.

Please make sure that your assistants file and tender to the defense the Notice of Disclosure in all cases where any of the three officers are or will be witnesses. Additionally the material should be filed and tendered in any case where any of the three officers have testified since August 19, 2010.

Also please remind your ASAs that the mere fact that this Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine any of the officers on the material. Your ASAs should, in the appropriate cases, file all necessary motions to preclude the use of the Giglio material at trial.

The case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1997). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2nd Cir. 1990); United States v. Veras, 51 F.3d 1365 (7th Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4th Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF ILLINOIS)
)
COUNTY OF COOK) SS.

IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS)
)
 vs) Case No. _____
)
 /)

NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. On August 19, 2010, Judge Michael Brown, in the case of The People of the State of Illinois v. Slawomir Plewa, Indictment No. 08CR-19286 found that Chicago Police Officer(s) Slawomir Plewa, Star No. 14604/Gerald Lodwich Star No. 6958 lied and gave false testimony in the Plewa case as well as lied and gave false testimony in the case of The People of the State of Illinois v. Sylwia Marcinczyk, Indictment No. 07CR-8869.

2./1. On August 19, 2010, Judge Michael Brown, in the case of the The People of the State of Illinois v. Slawomir Plewa, Indictment No. 08CR-19286 found that Chicago Police Officer Robert Jackson, Star No. 6958 lied and gave false testimony in the case of The People of the State of Illinois v. Sylwia Marcinczyk, Indictment No. 07CR-8869.

3./2. A copy of the transcript of Judge Brown's findings with respect to Officer(s) Plewa/Lodwich/Jackson is attached as Exhibit A.

Respectfully submitted,

Anita Alvarez
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Lynwood Police Officer Brain Dorian

Date: October 12, 2010

Cc: Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

As you may already know, Lynwood Police Officer Brian Dorian was charged with First Degree Murder. Officer Dorian also was a police officer in Lansing. The vast majority, if not all, of Officer Dorian's cases should be in Markham. I have asked our MIS Department to prepare a list of the felony cases where Officer Dorian is a participant or witness. With respect to misdemeanor and traffic cases, please have your ASAs check their files and see whether they have any cases on their call where Officer Dorian is a witness. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Dorian's testimony you should proceed on the case.

If you have a case where we cannot proceed without Officer Dorian's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Shauna or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Dorian's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *jm*

Re: Chicago Police Officer Donnie Lewis, Star#11145, 21st District

Date: October 26, 2010

Cc: Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Chicago Police Officer Donnie Lewis, Star# 11145 of the 21st District has been charged with Aggravated Battery under Case No. 10-4008138. Our office is the prosecuting authority in Officer Lewis' case. The case is currently pending in the Fourth District Courthouse in Maywood and is next up on October 29, 2010. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where Officer Lewis is a necessary witness and you are calling him as a witness, the fact that Officer Lewis has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Lewis is a witness on any pending felony cases. Once I have the results of that

search, I will forward them to each of you. Please don't call MIS and ask them to run another list. Units that do not have a computer case management system will have to check their files to determine whether Officer Lewis is a witness.

If you or the assistants that you supervise have a case where Officer Lewis is a necessary witness and you determine that he needs to be called in the case, and, at the time that Officer Lewis is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Detective John E. Killackey, III, Star #20163

Date: October 26, 2010

Cc: Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Chicago Police Detective John E. Killackey, III, Star #20163 has been placed on court supervision for the misdemeanor offenses of Aggravated Assault and Theft of Services under Case No. 10-1198469. Our office is the prosecuting authority in Detective Killackey's case. Detective Killackey's supervision is set to terminate on December 26, 2011.

If you or any of the assistants that you supervise have a case where you are calling Detective Killackey as a witness, the fact that Detective Killackey is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to his motive, interest or bias he may have in testifying as a witness for the State. The MIS Department is doing a computer search to see whether Detective Killackey is a witness on any pending felony cases. Once I have the results of

that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Detective Killackey is a witness.

If you or the assistants that you supervise have a case where Detective Killackey is a witness and you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Detective Killackey is still on court supervision, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS)
)
)
 vs) Case No. _____
)
 /)

NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That on June 24, 2010 Chicago Police Officer John E. Killackey, III, Star #20163, was placed on 18 months court supervision for the misdemeanor offenses of Aggravated Assault and Theft of Services under Case No. 10-1198469. The supervision is set to terminate on December 26, 2011.
2. That Officer Killackey will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Killackey regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Killackey regarding his court supervision in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Donnie Lewis, Star#11145, 21st District

Date: October 26, 2010

Cc: Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Chicago Police Officer Donnie Lewis, Star# 11145 of the 21st District has been charged with Aggravated Battery under Case No. 10-4008138. Our office is the prosecuting authority in Officer Lewis' case. The case is currently pending in the Fourth District Courthouse in Maywood and is next up on October 29, 2010. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where Office Lewis is a necessary witness and you are calling him as a witness, the fact that Officer Lewis has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Lewis is a witness on any pending felony cases. Once I have the results of that

search, I will forward them to each of you. Please don't call MIS and ask them to run another list. Units that do not have a computer case management system will have to check their files to determine whether Officer Lewis is a witness.

If you or the assistants that you supervise have a case where Officer Lewis is a necessary witness and you determine that he needs to be called in the case, and, at the time that Officer Lewis is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)
COUNTY OF COOK)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS)

VS

Case No. _____

/

NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Donnie Lewis, Star #11145, has been charged with Aggravated Battery under Case No. 10-4008138. That case is next up on October 29, 2010 in the Fourth Municipal District, Maywood, Illinois.
2. That Officer Lewis will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Lewis regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Lewis regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officers: James Franklin, Star # 15170
David Brown, Star # 15887
Erika Rodriguez, Star # 11057
Elvin Boone, Star # 1964

Date: October 28, 2010

Cc: Adrienne Mebane, First Assistant
Walt Hehner, Chief Deputy
Dan Kirk, Chief of Staff
Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau
Jack Blakey, ASA, Chief, Special Prosecutions Bureau
Patrick Driscoll, ASA, Chief, Civil Actions Bureau
Tisa Morris, ASA, Chief, Juvenile Justice Bureau
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please have your ASAs check their files to determine whether they have any cases on their call where Chicago Officers James Franklin, Star # 15170, David Brown, Star # 15887, Erika Rodriguez, Star # 11057 or Elvin Boone, Star # 1964 are witnesses. Each of these officers are assigned to the 3rd District. If any of these officers are witnesses on a pending case please determine whether the case can be proved without calling them as witnesses. If the cases cannot be proved without calling the officers as witnesses, please nolle the case. If the case can be proved without the officers' testimony, you should proceed on the case.

If you have a case where we cannot proceed without the officers' testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward, please contact Shauna or me prior to taking any action. Also, please have your ASAs keep track of how many cases involving these officers they have and how many of those cases were dismissed.

The MIS department is conducting a computer search to determine whether any of these officers are witnesses on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't ask MIS to have another list run. Units that don't have a computer case management system will have to check their files to determine whether any of these officers are witnesses on any pending cases.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Maywood Police Officer Robert M. Welch

Date: November 29, 2010

Cc: Adrienne Mebane, First Assistant
Walt Hehner, Chief Deputy
Dan Kirk, Chief of Staff
Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau
Jack Blakey, ASA, Chief, Special Prosecutions Bureau
Patrick Driscoll, ASA, Chief, Civil Actions Bureau
Tisa Morris, ASA, Chief, Juvenile Justice Bureau
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

As you may already know, Maywood Police Officer Robert M. Welch was recently charged with federal offenses. Our MIS Department has compiled a list of Officer Welch's felony cases. In the recent past, Officer Welch has primarily been a Maywood Police Officer. John Brassil will review the list and determine whether Officer Welch has been involved in any felony cases outside of Maywood.

If there are any such felony cases, John will notify you of that fact. If you or any of the assistants that you supervise have a case where Officer Welch is a witness, please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Welch's testimony

you should proceed on the case.

If you have a case where we cannot proceed without Officer Welch's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Shauna or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Welch's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Thomas O'Brien, Star# 12964, Unit 153

Date: January 6, 2011

Cc: Shauna Boliker, First Assistant
Walt Hehner, Chief Deputy
Dan Kirk, Chief of Staff
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau
Jack Blakey, ASA, Chief, Special Prosecutions Bureau
Patrick Driscoll, ASA, Chief, Civil Actions Bureau
Tisa Morris, ASA, Chief, Juvenile Justice Bureau
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Thomas O'Brien, Star# 12964, Unit 153 has been charged with DUI under Ticket No. TW128069. Our office is the prosecuting authority in Officer O'Brien's case. The case is currently pending at Traffic Court in Chicago. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer O'Brien as a witness, the fact that Officer O'Brien has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer O'Brien is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer O'Brien is a potential witness.

If you or the assistants that you supervise have a case where Officer O'Brien is a witness and you determine that it is necessary to call him in the case, and, at the time that Officer O'Brien is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)
COUNTY OF COOK)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS

VS

Case No.

NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Thomas O'Brien, Star #12964, has been charged with DUI under Ticket Number No. TW128069. That case is next up on January 24, 2011 in Traffic Court at the Daley Center.
2. That Officer O'Brien will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer O'Brien regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer O'Brien regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

~~To:~~ All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer James Wodnicki, Star# 15289

Date: January 14, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please have your ASAs check their files and see whether they have any cases on their call where Chicago Police Officer James Wodnicki, Star# 15289 is a witness. If he is a witness on a case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Wodnicki's testimony you should proceed on the case.

If you have a case where we cannot proceed without Officer Wodnicki's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Wodnicki's cases they have and how

many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Illinois State Trooper Ramon Coss, ID # 6027

Date: January 14, 2011

Cc: Shauna Boliker, First Assistant
Walt Hehner, Chief Deputy
Dan Kirk, Chief of Staff
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau
Jack Blakey, ASA, Chief, Special Prosecutions Bureau
Patrick Driscoll, ASA, Chief, Civil Actions Bureau
Tisa Morris, ASA, Chief, Juvenile Justice Bureau
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Illinois State Trooper Ramon Coss, ID # 6027 has been charged with Disorderly Conduct under Case No. 10 CM 458. The case is currently pending in the Circuit Court of Sauk County, Wisconsin. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Trooper Coss as a witness, the fact that Trooper Coss has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Trooper Coss is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case

management system will have to check their files to determine whether Trooper Coss is a witness.

If you or the assistants that you supervise have a case where Trooper Coss is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Trooper Coss is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS)

VS

Case No. _____

NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Illinois State Trooper Ramon Coss, ID# 6027 has been charged with Disorderly Conduct under Case No. 10 CM 458. That case is pending in the Circuit Court of Sauk County, Wisconsin.
2. That Trooper Coss will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Trooper Coss regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Trooper Coss regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Charles Mc Clay, Star # 4735, 6th District

Date: January 25, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Charles Mc Clay, Star# 4735, 6th District has been charged with DUI under Ticket No. TW021773. Our office is the prosecuting authority in Officer Mc Clay's case. The case is currently pending at Traffic Court in Chicago and is next up on February 25, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Mc Clay as a witness, the fact that Officer Mc Clay has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Mc Clay is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Mc Clay is a witness in any pending cases.

If you or the assistants that you supervise have a case where Officer McClay is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Mc Clay is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)
COUNTY OF COOK)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS)

vs

Case No. _____

NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Charles Mc Clay, Star #4735, has been charged with DUI under Case No. TW021773. That case is next up on February 25, 2011 in Traffic Court, Daley Center, Chicago, Illinois.
2. That Officer Mc Clay will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Mc Clay regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Mc Clay regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Kyle Gaffney, Star# 6245, 9th District

Date: January 26, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Kyle Gaffney, Star# 6245, 9th District has been charged with DUI under Case No. TT473764. Our office is the prosecuting authority in Officer Gaffney's case. The case is currently pending at Traffic Court in Chicago and is next up on January 27, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Gaffney as a witness, the fact that Officer Gaffney has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Gaffney is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Gaffney is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Gaffney is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Gaffney is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

1

vs

Case No.

/

NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Kyle Gaffney, Star #6245, has been charged with DUI under Case No. TT473764. That case is next up on January 27, 2011 at Traffic Court, Chicago Illinois.
2. That Officer Gaffney will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Gaffney regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Gaffney regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *jm*

Re: Chicago Police Officer Dale Fleming, Star# 19955

Date: January 26, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Dale Fleming, Star# 19955 has been charged with Domestic Battery under Case No. 11 DV 30086. Our office is the prosecuting authority in Officer Fleming's case. The case is currently pending in the Third Municipal District in Rolling Meadows and is next up on February 16, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Fleming as a witness, the fact that Officer Fleming has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Fleming is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Fleming is a witness in any pending cases.

If you or the assistants that you supervise have a case where Officer Fleming is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Fleming is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS)

VS

Case No. _____

NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Dale Fleming, Star # 19955 has been charged with Domestic Battery under Case No. 11 DV 30086. That case is next up on February 16, 2011 in the Third Municipal District in Rolling Meadows, Illinois.
2. That Officer Fleming will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Fleming regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Fleming regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Dale Fleming, Star# 19955

Date: February 22, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please be advised that Chicago Police Officer Dale Fleming is no longer a defendant in a pending misdemeanor case. His case in Rolling Meadows was *nolle prosequere* on February 16, 2011. Thank you.



OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Joseph E. Avila, Star# 17883, 8th District

Date: February 22, 2011

Cc: Shauna Boliker, First Assistant
Walt Hehner, Chief Deputy
Dan Kirk, Chief of Staff
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau
Jack Blakey, ASA, Chief, Special Prosecutions Bureau
Patrick Driscoll, ASA, Chief, Civil Actions Bureau
Tisa Morris, ASA, Chief, Juvenile Justice Bureau
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Joseph E. Avila, Star# 17883, 8th District has been charged with Aggravated Assault under Case No. 11 DV 70368. Our office is the prosecuting authority in Officer Avila's case. The case is currently pending in Domestic Violence Court, Branch 60 in Chicago and is next up on March 11, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Avila as a witness, the fact that Officer Avila has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Avila is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Avila is a witness.

If you or the assistants that you supervise have a case where Officer Avila is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Avila is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

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COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

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NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Joseph E. Avila, Star #17883, has been charged with Aggravated Assault under Case No. 11 DV 70368. That case is next up on March 11, 2011 in Branch 60, 555 W. Harrison, Chicago, Illinois.
2. That Officer Avila will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Avila regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Avila regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Dale Fleming, Star# 19955

Date: February 22, 2011

Cc: Shauna Boliker, First Assistant
Walt Hehner, Chief Deputy
Dan Kirk, Chief of Staff
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau
Jack Blakey, ASA, Chief, Special Prosecutions Bureau
Patrick Driscoll, ASA, Chief, Civil Actions Bureau
Tisa Morris, ASA, Chief, Juvenile Justice Bureau
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please be advised that Chicago Police Officer Dale Fleming is no longer a defendant in a pending misdemeanor case. His case in Rolling Meadows was *nolle prosequere* on February 16, 2011. Thank you.



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Sylvia Broadway, Star No. 3330

Date: March 15, 2011

Cc: Shauna Boliker, First Assistant
Walt Hehner, Chief Deputy
Dan Kirk, Chief of Staff
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau
Jack Blakey, ASA, Chief, Special Prosecutions Bureau
Patrick Driscoll, ASA, Chief, Civil Actions Bureau
Tisa Morris, ASA, Chief, Juvenile Justice Bureau
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Sylvia Broadway, Star# 3330, has been charged with DUI under Case No. TW121699. Our office is the prosecuting authority in Officer Broadway's case. The case is currently pending at Traffic Court in Chicago and is next up on April 13, 2011 at Traffic Court in Chicago. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Broadway as a witness, the fact that Officer Broadway has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Broadway is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Broadway is a witness in any pending cases.

If you or the assistants that you supervise have a case where Officer Broadway is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Broadway is testifying her case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

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COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS)

VS

Case No. _____

SYLVIA BROADWAY

NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Sylvia Broadway, Star #3330, has been charged with DUI under Case No. TW121699. That case is next up on April 14, 2011 in Traffic Court, Chicago, Illinois.
2. That Officer Broadway will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Broadway regarding her pending case in return for her testimony in the above-captioned case.
4. That no threats have been made to Officer Broadway regarding her pending case in return for her testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Bruce Askew, Star# 9015

Date: March 15, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Bruce Askew, Star# 9015, has been charged with Domestic Battery under Case No. 11 DV 7130. Our office is the prosecuting authority in Officer Askew's case. The case is currently pending at Branch 63 at 555 W. Harrison Street in Chicago and is next up on March 28, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Askew as a witness, the fact that Officer Askew has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Askew is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Askew is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Askew is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Askew is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

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COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS)

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NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Bruce Askew, Star #9015, has been charged with Domestic Battery under Case No. 11 DV 71530. That case is next up on March 28, 2011 in Branch 63, 555 W. Harrison, Chicago, Illinois.
2. That Officer Askew will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Askew regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Askew regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Venus Rodriguez, Star# 12474, Unit 007

Date: March 17, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Venus Rodriguez, Star# 12474, 7th Dist. has been charged with Leaving the Scene of a Property Damage Accident under Case No. TW 171473. Our office is the prosecuting authority in Officer Rodriguez's case. The case is currently pending at Traffic Court in Chicago and is next up on April 13, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Rodriguez as a witness, the fact that Officer Rodriguez has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Rodriguez is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Rodriguez is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Rodriguez is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Rodriguez is testifying her case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

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COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

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NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Venus Rodriguez, Star #12474, has been charged with Leaving the Scene of a Property Damage Accident under Case No. TW 171473. That case is next up on April 13, 2011 in Traffic Court, Chicago, Illinois.
2. That Officer Rodriguez will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Rodriguez regarding her pending case in return for her testimony in the above-captioned case.
4. That no threats have been made to Officer Rodriguez regarding her pending case in return for her testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Sean Dailey, Star# 10890

Date: March 22, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please have the ASAs that you supervise check their files and see whether they have any cases on their call where Chicago Police Officer Sean Dailey, Star# 10890, 16th District is a witness. With respect to felony cases, the MIS Department is doing a computer search to see whether Officer Dailey is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Dailey is a witness.

If he is a witness on the case, please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Dailey's testimony you should proceed on the

case.

If you have a case where we cannot proceed without Officer Dailey's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Dailey's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officers: Luis Contreras, Star# 13529
Susana La Casa Caliz, Star# 8686

Date: March 28, 2011

Cc: Shauna Boliker, First Assistant
Walt Hehner, Chief Deputy
Dan Kirk, Chief of Staff
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau
Jack Blakey, ASA, Chief, Special Prosecutions Bureau
Patrick Driscoll, ASA, Chief, Civil Actions Bureau
Tisa Morris, ASA, Chief, Juvenile Justice Bureau
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please have your ASAs check their files and see whether they have any cases on their call where Chicago Police Officers Luis Contreras, Star# 13529 or Susana La Casa Caliz, Star# 8686 are witnesses. With respect to felony cases, the MIS Department is doing a computer search to see whether Officers Contreras or Caliz are witnesses on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether these officers are witnesses.

If they are witnesses on a case please determine whether the case can be proved without

calling them as witnesses. If the case cannot be proved without calling them as witnesses, please nolle the case. If the case can be proved without the officers' testimony you should proceed on the case.

If you have a case where we cannot proceed without the officers' testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Contreras' and Caliz's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Bruce Askew, Star# 9015

Date: April 5, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please be advised that Chicago Police Officer Bruce Askew's, Star# 9015, Domestic Battery case, 11 DV 7130 has been nolle and is no longer pending.



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Richard Kleinpass, Star# 14625, 17th District

Date: April 12, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Richard Kleinpass, Star# 14625, 17th District, has been charged with Violation of an Animal Owner's Duties, under Case No. 11 MC1-204301. Our office is the prosecuting authority in his case. The case is currently pending at Branch 44 at 3150 W. Flournoy Street in Chicago and is next up on April 27, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Kleinpass as a witness, the fact that Officer Kleinpass has a pending criminal case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Kleinpass is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Kleinpass is a witness.

If you or the assistants that you supervise have a case where Officer Kleinpass is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Kleinpass is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

) SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS)

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vs)

) Case No. _____
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NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Richard Kleinpass, Star #14625, has been charged with Violation of Animal Owner's Duty under Case No. 11 MC1-204301. That case is next up on April 27, 2011 in Branch 44, 3150 W. Flourney, Chicago, Illinois.
2. That Officer Kleinpass will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Kleinpass regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Kleinpass regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez

State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Matthew Koegler, Star# 12381, Unit 025

Date: April 25, 2011

Cc: Shauna Boliker, First Assistant
Walt Hehner, Chief Deputy
Dan Kirk, Chief of Staff
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau
Jack Blakey, ASA, Chief, Special Prosecutions Bureau
Patrick Driscoll, ASA, Chief, Civil Actions Bureau
Tisa Morris, ASA, Chief, Juvenile Justice Bureau
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Matthew Koegler, Star# 12381, Unit 025 has been charged with DUI under Case No. TW-113357. Our office is the prosecuting authority in Officer Koegler's case. The case is currently pending at Traffic Court in Chicago and is next up on June 1, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Koegler as a witness, the fact that Officer Koegler has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Koegler is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Koegler is a witness.

If you or the assistants that you supervise have a case where Officer Koegler is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Koegler is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)
COUNTY OF COOK)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS)
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 vs)
)
 /)

Case No. _____

NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Matthew Koegler, Star #12381, has been charged with DUI under Case No. TW-113357. That case is next up on June 1, 2011 at Traffic Court, Daley Center, Chicago, Illinois.
2. That Officer Koegler will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Koegler regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Koegler regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ
STATE'S ATTORNEY

CRIMINAL DIVISION
2850 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Sgt. Edward Howard, Star# 2337, 6th District

Date: April 28, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please have your ASAs check their files and see whether they have any cases on their call where Chicago Police Sgt. Edward Howard, Star# 2337, 6th District is a witness. If he is a witness on a case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Sgt. Howard's testimony you should proceed on the case.

If you have a case where we cannot proceed without Sgt. Howard's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Sgt. Howard's cases they have and how many of those cases

were dismissed.

If you or your ASAs have any questions, please call me. Thank you.